

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HUAWEI TECHNOLOGIES CO., LTD.;)
HUAWEI DEVICE CO., LTD.; and HUAWEI)
DEVICE (SHENZHEN) CO., LTD.,)
Plaintiffs,) Civil Action No. 1:24-cv-04708
v.)
PANOPTIS PATENT MANAGEMENT, LLC,)
Defendant.) So ordered.

PANOPTIS PATENT MANAGEMENT, LLC;)
PANOPTIS EQUITY HOLDINGS, LLC;)
OPTIS WIRELESS TECHNOLOGY, LLC;)
OPTIS CELLULAR TECHNOLOGY, LLC;)
and UNWIRED PLANET INTERNATIONAL)
LIMITED,)
Counterclaim-Plaintiffs,)
v.)
HUAWEI TECHNOLOGIES CO., LTD.;)
HUAWEI DEVICE CO., LTD.; and HUAWEI)
DEVICE (SHENZHEN) CO., LTD.,)
Counterclaim-Defendants.)

**DEFENDANT'S AND COUNTERCLAIM PLAINTIFFS' MOTION FOR LEAVE TO (I)
FILE UNDER SEAL THEIR UNREDACTED MEMORANDUM OF LAW IN SUPPORT
OF THEIR MOTION TO DISMISS AND CERTAIN EXHIBITS TO THE
DECLARATION OF JOSHUA A. WHITEHILL AND (II) PUBLICLY FILE THEIR
REDACTED MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION TO
DISMISS AND CERTAIN EXHIBITS TO THE DECLARATION OF JOSHUA A.
WHITEHILL**

PLEASE TAKE NOTICE that Defendant and Counterclaim-Plaintiff PanOptis Patent Management, LLC and Counterclaim-Plaintiffs PanOptis Equity Holdings, Inc, Optis Wireless Technology, LLC, Optis Cellular Technology, LLC, and Unwired Planet International Limited, by and through their undersigned counsel, and upon the accompanying Memorandum of Law in Support and Declaration of Ian G. DiBernardo and the exhibits thereto, hereby move this Court, before the Honorable Alvin K. Hellerstein, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, NY, for an order granting them leave to: (i) file under seal an unredacted Memorandum of Law in Support of Motion to Dismiss, and exhibits A and E-L to the Declaration of Joshua A. Whitehill and (ii) file publicly a redacted Memorandum of Law in Support of Motion to Dismiss, and exhibits A and E-L to the Declaration of Joshua A. Whitehill.

Date: July 23, 2025

Respectfully submitted,

By: /s/ Ian G. DiBernardo

Ian G. DiBernardo
Jason M. Sobel
Joshua A. Whitehill
BROWN RUDNICK LLP
Seven Times Square
New York, NY 10036
Tel.: 212.209.4800
Email: idibernardo@brownrudnick.com
Email: jsobel@brownrudnick.com
Email: jwhitehill@brownrudnick.com